

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACK  
ON SEPTEMBER 11, 2001**

**FEDERAL INSURANCE**

**COMPANY, et al,**

**Plaintiffs,**

**v.**

**AL QAIDA, et al**

**Defendants**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**CIVIL ACTION NO.: 03 CV 6978**

\* \* \* \* \*

**THIRD PARTY COMPLAINT AGAINST THIRD PARTY DEFENDANT  
JAMAL AHMED AL FADL**

Comes now Third Party Plaintiff Muslim World League (“MWL”) and, through undersigned counsel, complains against Third Party Jamal Ahmed Al Fadl, in connection with the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.
3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

**FIRST CAUSE OF ACTION  
INDEMNIFICATION**

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Third Party Defendant Jamal Ahmed Al Fadl was a member of al Qaeda.

6. Prior to 1996, Third Party Defendant Jamal Ahmed Al Fadl managed al Qaeda's finances in Sudan and, based upon information and belief, was responsible for enhancing the value of al Qaeda's investments.
7. Third Party Defendant Jamal Ahmed Al Fadl aided, abetted, materially supported and conspired with al Qaeda, Osama bin Laden, and other co-conspirators by enhancing the value of Al Qaeda's investments and holdings.
8. Al Qaeda, Osama bin Laden, and other co-conspirators were responsible for the attacks on New York and Virginia of September 11, 2001.
9. Thus, Third Party Defendant Jamal Ahmed Al Fadl is responsible to the plaintiffs in this case since his conduct, managing Al-Qaeda's investments and enhancing its financial resources, is and was the proximate cause of the injuries pled herein.
10. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11, it was without the knowledge of MWL and contrary to the best efforts of MWL to prevent such from happening.
11. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Third Party Defendant Jamal Ahmed Al Fadl, in his role as financial manager of al Qaeda, was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL's intended purpose.
12. Therefore, if MWL should be held liable for the actions of Third Party Defendant Jamal Ahmed Al Fadl, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Third Party Defendant Jamal Ahmed Al Fadl for all sums adjudged against MWL herein.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Khalid Sheik Mohammed in the exact amount of any judgment entered herein against MWL.

Respectfully submitted,

---

Martin F. McMahon (MM 4389)  
Martin McMahon & Associates  
1150 Connecticut Ave., N.W.  
Ste. 900  
Washington, D.C. 20036  
(202) 862-4343  
*Attorney for Third Party Plaintiff*  
*Muslim World League*